

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

VS.

GABRIEL NAVARRO ALMANZA (1)
RUDI KRYSTAL ALMANZA (2)
CHARLES ANTHONY LECARA (3)
a/k/a “ERIC”
a/k/a “BLOODHOUND”
Defendants.

CRIMINAL NO.: SA-20-CR-00329-DAE

SUPERSEDING INDICTMENT

**Ct 1: 18 U.S.C. § 371: Conspiracy
Cts. 2-7: 18 U.S.C. §§ 922(a)(6) & 2:
False Statements Made in Connection
with the Acquisition of Firearms; and
Aiding and Abetting;
Cts. 8, 9: 18 U.S.C. §§ 554 & 2:
Smuggling Goods from the United States;
and Aiding and Abetting**

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. § 371]

Beginning on or about March 2018, and continuing thereafter until on or about July 2018, in the Western District of Texas and elsewhere, defendants

GABRIEL NAVARRO ALMANZA (1)
RUDI KRYSTAL ALMANZA (2)
CHARLES ANTHONY LECARA (3)
a/k/a "ERIC"
a/k/a "BLOODHOUND"

unlawfully, knowingly, and intentionally, did combine, conspire, confederate and agree with each other and others to commit certain offenses against the United States: making false statements in connection with the acquisition of firearms, in violation of 18 U.S.C. § 922(a)(6); and smuggling goods from the United States, contrary to 18 U.S.C. § 554.

Manner and Means of the Conspiracy

1. As part of the conspiracy, **GABRIEL NAVARRO ALMANZA (1)** and **RUDI KRYSTAL ALMANZA (2)** acquired firearms by purchasing them in the Western District of Texas and elsewhere from Federal Firearms Licensees (“FFLs”), licensed under the provisions of Chapter 44 of Title 18, and operating as licensed gun dealers.

2. As part of the conspiracy, and in the course of purchasing firearms in the Western District of Texas and elsewhere, **GABRIEL ALMANZA (1)** and **RUDI KRYSTAL ALMANZA (2)** knowingly made false statements and representations with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of a business licensed under the provisions of Chapter 44 of Title 18, United States Code, in that **GABRIEL ALMANZA (1)** and **RUDI KRYSTAL ALMANZA (2)** executed the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) Form 4473, Firearms Transaction Record, representing that the Defendant executing each form was the actual buyer of the firearm(s), when in fact **CHARLES ANTHONY LECARA (3)**, a/k/a “ERIC”; a/k/a/ “BLOODHOUND” (“LECARA”) was the actual buyer.

3. As part of the conspiracy, the Defendants acquired the types of firearms at the direction of **LECARA (3)** that are popular with cartels.

4. As part of the conspiracy, **GABRIEL NAVARRO ALMANZA (1)** and **RUDI KRYSTAL ALMANZA (2)** transferred the firearms to **LECARA (3)** to be stored, sold, and transported to unidentified cartels.

5. As part of the conspiracy, the Defendants unlawfully, knowingly, and intentionally, attempted to export and send firearms from the United States contrary to the laws and regulations of the United States.

Overt Acts

In furtherance of the conspiracy and to affect the object thereof, Defendants committed numerous overt acts, which included the following:

6. On or about March 18, 2018, **RUDI KRYSTAL ALMANZA (2)** purchased: 1) a Century Arms International (“CAI”), Model: C39V2, 7.62 caliber rifle, (Serial Number: C39V2A38482); 2) a CAI, Model: C39V2, 7.62 caliber rifle, (Serial Number: C39V2A42867); 3) Defense Procurement MFG. Services (“DPMS”), Model: Panther Sportical, 308-caliber rifle, (Serial Number: FFK019682); and 4) a Savage, Model: MSR-15, 556 caliber rifle, (Serial Number: 03-019096), from Academy Sports and Outdoor Store No. 40, a federally licensed firearms dealer located at 7903 S IH 35, San Antonio, Texas 78224. **RUDI KRYSTAL ALMANZA (2)** falsely stated on ATF Form 4473 that she was the actual buyer of these firearms when in truth and fact **LECARA (3)** was the actual buyer.

7. On an unknown date after March 18, 2018, and continuing through July 2018, **LECARA (3)** made representations to **GABRIEL NAVARRO ALMANZA (1)** that **LECARA (3)** was working with unidentified cartels and that the firearms would be moved “south” and that **LECARA (3)** was dealing with an unidentified individual from Mexico to whom he was transferring the firearms.

8. On or about April 13, 2018, **RUDI KRYSTAL ALMANZA (2)** purchased: 1) a CAI, Model: C39V2, 7.62 caliber rifle, (Serial Number: C39V2A38627); 2) a CAI, Model: C39V2, 7.62 caliber rifle, (Serial Number: C39V2A48648); and 3) a DPMS, Model: A15, 5.56mm rifle, (Serial Number: FFH232087) from Academy Sports and Outdoor Store No. 42, a federally licensed firearms dealer located at 714 W. Loop 1604 N., San Antonio, Texas 7825. **RUDI KRYSTAL ALMANZA (2)** falsely stated on ATF Form 4473 that she was the actual buyer of

these firearms when in truth and fact **LECARA (3)** was the actual buyer. **RUDI KRYSTAL ALMANZA (2)** and **LECARA (3)** aided and abetted each other in the purchase and subsequent attempted exportation of said firearms knowing they were intended for export contrary to any laws or regulations of the United States.

9. On or about April 20, 2018, **GABRIEL NAVARRO ALMANZA (1)** purchased: 1) a Zastava, Model: PAP M92PV, 7.62-caliber pistol, (Serial Number: M92PV073862); and 2) a Ceska Zbrojovka (“CZ”), Model: Scorpion EVO 3 S1, 9mm pistol, (Serial Number: C397243) from Adelbridge Inc., a federally licensed firearms dealer located at 10122 San Pedro Avenue, San Antonio, Texas 78216. **GABRIEL NAVARRO ALMANZA (1)** falsely stated on ATF Form 4473 that he was the actual buyer of these firearms when in truth and fact **LECARA (3)** was the actual buyer.

10. On or about April 20, 2018, **RUDI KRYSTAL ALMANZA (2)** purchased: 1) a Springfield Armory, Model: Saint, 5.56mm pistol, (Serial Number: ST116678); and 2) an American Tactical Imports (“ATI”), Model: Omni, 5.56mm pistol, (Serial Number: NS152401) from Adelbridge Inc., a federally licensed firearms dealer located at 10122 San Pedro Avenue, San Antonio, Texas 78216. **RUDI KRYSTAL ALMANZA (2)** falsely stated on ATF Form 4473 that she was the actual buyer of these firearms when in truth and fact **LECARA (3)** was the actual buyer.

11. On or about April 22, 2018, **GABRIEL NAVARRO ALMANZA (1)** purchased: 1) a CAI, Model: C39V2, 7.62-caliber rifle, (Serial Number: C39V2A42040); 2) a CAI, Model: C39V2, 7.62-caliber rifle, (Serial Number: C39V2A41083); 3) a CAI, Model: C39V2, 7.62-caliber rifle, (Serial Number C39V2A41587); and 4) a Savage, Model: MSR-15, 5.56mm rifle, (Serial Number: 03-000771) from Academy Sports and Outdoors Store #39, a federally licensed dealer of

firearms located at 7523 NW Loop 410, San Antonio, Texas 78245. **GABRIEL NAVARRO ALMANZA (1)** falsely stated on ATF Form 4473 that he was the actual buyer of these firearms, when in truth and fact **LECARA (3)** was the actual buyer.

12. On or about June 3, 2018, **GABRIEL NAVARRO ALMANZA (1)** purchased: 1) a Radical Firearms, Model: Rad-15, .223 caliber rifle (Serial Number: RD17525); 2) a Radical Firearms, Model: Rad-15, .223 caliber rifle (Serial Number: RD17562); and 3) a ROMARM/CUGIR, Model: WASR-10, 7.62 caliber rifle (Serial Number: A1-57707-17) from Blackland Guns, a licensed dealer of firearms located at 4241 HWY 34 S, Greenville, Texas 75402. **GABRIEL NAVARRO ALMANZA (1)** falsely stated on ATF Form 4473 that he was the actual buyer of these firearms, when in truth and fact **LECARA (3)** was the actual buyer. **GABRIEL NAVARRO ALMANZA (2)** and **LECARA (3)** aided and abetted each other in the purchase and subsequent attempted exportation of said firearms knowing they were intended for export contrary to any laws or regulations of the United States.

COUNTS TWO-SEVEN
[18 U.S.C. §§ 922(a)(6) & 2]

On the dates listed below, in the Western District of Texas, each Defendant, as set forth below, knowingly made, and aided and abetted and caused to be made, in connection with the acquisition of firearms, a false and fictitious statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the Federal Licensed Firearms Dealers listed below, businesses licensed under the provisions of Chapter 44 of Title 18, United States Code in that **GABRIEL NAVARRO ALMANZA (1)** and **RUDI KRYSTAL ALMANZA (2)** executed an ATF Form 4473, Firearms Transaction Record, representing the Defendant executing each form was the actual purchaser of the firearms listed on the forms, when **CHARLES ANTHONY LECARA (3)** a/k/a “ERIC;

a/k/a “BLOODHOUND” was the actual buyer, all in violation of Title 18, United States Code, Sections 922(a)(6) & 2.

COUNT	DATE	DEFENDANTS	FIREARM(S)	FFL
Two	March 18, 2018	Rudi Krystal Almanza (2); Charles Anthony Lecara (3)	4 rifles	Academy Sports & Outdoors #40 (San Antonio, Texas)
Three	April 13, 2018	Rudi Krystal Almanza (2); Charles Anthony Lecara (3)	3 rifles	Academy Sports & Outdoors #42 (San Antonio, Texas)
Four	April 20, 2018	Gabriel Navarro Almanza (1); Charles Anthony Lecara (3)	2 pistols	Adelbridge (San Antonio, Texas)
Five	April 20, 2018	Rudi Krystal Almanza (2); Charles Anthony Lecara (3)	2 pistols	Adelbridge (San Antonio, Texas)
Six	April 22, 2018	Gabriel Navarro Almanza (1); Charles Anthony Lecara (3)	4 rifles	Academy Sports & Outdoors #39 (San Antonio, Texas)
Seven	June 3, 2018	Gabriel Navarro Almanza (1); Charles Anthony Lecara (3)	3 rifles	Blackland Guns [SAXET Gun Show] (San Antonio, Texas)

COUNT EIGHT
[18 U.S.C. §§ 554 & 2]

That on or about April 13, 2018, in the Western District of Texas, Defendants,

**RUDI KRYSTAL ALMANZA (2) AND
CHARLES ANTHONY LECARA (3)
a/k/a “ERIC”
a/k/a “BLOODHOUND”**

did knowingly and unlawfully aid and abet the exportation and attempted exportation from the United States of merchandise, to wit: multiple firearms, including: 1) a CAI, Model: C39V2, 7.62

caliber rifle, (Serial Number: C39V2A38627); 2) a CAI, Model: C39V2, 7.62 caliber rifle, (Serial Number: C39V2A48648); and 3) a DPMS, Model: A15, 5.56mm rifle, (Serial Number: FFH232087) contrary to any law or regulation of the United States, and aided and abetted the purchase, transportation, concealment, or sale of said firearms prior to exportation knowing that the firearms were intended for export, the exportation and attempted exportation being contrary to any law or regulation of the United States and had not obtained a license or written authorization for such attempted export, in violation of Title 50, United States Code, Section 4819 and Title 15, Code of Federal Regulations, Sections 774 and 736.2(b)(1), all in violation of Title 18, United States Code, Sections 554 & 2.

COUNT NINE
[18 U.S.C. §§ 554 & 2]

On or about June 3, 2018, in the Western District of Texas, Defendants,

GABRIEL NAVARRO ALMANZA (1) AND
CHARLES ANTHONY LECARA (3)
a/k/a “ERIC”
a/k/a “BLOODHOUND”


did knowingly and unlawfully aid and abet the exportation and attempted exportation from the United States of merchandise, to wit: multiple firearms, including: 1) a Radical Firearms, Model: Rad-15, .223 caliber rifle (Serial No.: RD17525); 2) a Radical Firearms, Model: Rad-15, .223 caliber rifle (Serial Number: RD17562); and 3) a ROMARM/CUGIR, Model: WASR-10, 7.62 caliber rifle (Serial Number: A1-57707-17) contrary to any law or regulation of the United States, and aided and abetted the purchase, transportation, concealment, or sale of said firearms prior to exportation knowing that the firearms were intended for export, the exportation and attempted exportation being contrary to any law or regulation of the United States and had not obtained a license or written authorization for such attempted export, in violation of Title 50, United States

Code, Section 4819 and Title 15, Code of Federal Regulations, Sections 774 and 736.2(b)(1), all in violation of Title 18, United States Code, Sections 554 & 2.

A TRUE BILL


FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF
UNITED STATES ATTORNEY

BY: 

FOR JOSEPH T. LO GALBO
Assistant United States Attorney